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7 IMAGIC, LLC, RICHARD L. CHANG  
HOLDINGS, LLC, and BEN CHANG  
8

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11

12 **Biosuccess Biotech, Co. Ltd.,**

13 Plaintiff;

14 v.

15 **Rich Pharmaceuticals, Inc.,** a Nevada  
Corporation formerly known as Nepia,  
16 Inc., **Imagic, LLC,** a California LLC,  
**Richard L. Chang Holdings, LLC,** a  
17 New Jersey LLC, **Ben Chang,** an  
individual, **and Does 1 through 10,**  
18 inclusive,

19 Defendants.  
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**Case No. CV13-01340 JAK (ANx)**

**DECLARATION OF CHRISTOPHER  
SARGENT IN SUPPORT OF MOTION TO  
DISMISS BIOSUCCESS' COMPLAINT  
FROM CONSOLIDATED CASE NO. 2:13-  
CV-00310 JAK UNDER RULE 12(B)(6);  
OR IN THE ALTERNATIVE FOR  
SUMMARY JUDGMENT UNDER F.R.C.P  
RULE 56**

1 I, Christopher Sargent, declare under penalty of perjury as follows:

2 1. I am an attorney admitted to practice before this Court, and I am a  
3 partner at the law firm of Entrepreneur Law Group LLP, counsel for Rich  
4 Pharmaceuticals Inc., Imagic LLC, Richard L. Chang Holdings LLC, and Ben  
5 Chang in this matter. I have personal knowledge of the facts set forth in this  
6 declaration, and if called to do so I could and would testify competently to the  
7 same. I make the statements here of my own personal knowledge, except where  
8 stated on information and belief, which statements I believe to be true, and if called  
9 to do so, I could and would testify competently to those matters stated here.

10 2. Attached as **Exhibit 1** is a true and correct copy of selected pages  
11 from the deposition of Chi-Ming (Fred) Wu, Chief Executive Office of Biosucces  
12 Biotech, Co., Ltd. (Cayman and Nevada entities). That deposition was taken by  
13 Jack Russo on March 6, 2014.

14  
15 I declare under penalty of perjury that the foregoing are true and correct of  
16 my personal knowledge, and that this Declaration was entered into on this 13th day  
17 of June 2014 in San Francisco, California.

18  
19 /s/ Christopher Sargent  
20 Christopher Sargent  
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